

# EXHIBIT C

June 11, 2025

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, Case No. 3:23-md-03084  
INC., PASSENGER SEXUAL CRB  
ASSAULT LITIGATION

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This Document Relates to:

ALL ACTIONS

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VIDEO DEPOSITION OF UBER TECHNOLOGIES, INC.'s  
30(b)(6) CORPORATE REPRESENTATIVE - ELIZABETH ROSS

San Francisco, California

Wednesday, June 11, 2025

Volume 1

STENOGRAPHICALLY REPORTED BY:  
REBECCA L. ROMANO, RPR, CSR, CCR  
California CSR No. 12546  
Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491

JOB NO. 6899600-001

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1 (Video playing.)

2 Q. (By Ms. Walsh) Okay. Let me ask you  
3 this first: Do you think that that rider was --  
4 that someone watching that would think, Okay. This  
5 person is supposed to seem like they're kind of  
6 inebriated after drinking on New Year's Eve?

7 A. Yeah, I think someone could watch that  
8 and assume that that person might have had a few  
9 drinks --

10 Q. Okay.

11 A. -- during their New Year's party, yes.

12 Q. Okay. And -- and that is something that  
13 Uber was comfortable marketing itself as -- strike  
14 that.

15 That was something that Uber was  
16 comfortable portraying in its -- in its marketing,  
17 that getting in an Uber and taking an Uber after  
18 you've had some drinks out celebrating is an okay  
19 thing to do?

20 A. Yes, and it's done in collaboration with  
21 MADD.

22 Q. Okay.

23 A. Which I can explain who MADD is. But  
24 MADD is Mothers Against Drunk Driving. And so it's  
25 an ad campaign that's done in partnership with them

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1 to drive awareness of making sure people don't get  
2 behind the wheel when they're drinking.

3 Q. Okay. And just focus on my question for  
4 now. We can talk about MADD if you want.

5 But am I correct that Uber was  
6 comfortable communicating to people through its  
7 marketing that having some drinks and getting in an  
8 Uber is a safe thing to do?

9 A. Yes, I think with this campaign, we are  
10 showing people that are drinking and using Uber.  
11 But I do not think that we're showing them drinking  
12 to excess. But, yes, we are showing them drinking.

13 Q. Okay. Does -- are you aware in any of  
14 the marketing materials that you've look at that  
15 say, You shouldn't use Uber if you've been drinking  
16 to excess?

17 A. Not that I'm aware of off the top of my  
18 head, no.

19 Q. Okay. And you understand that that could  
20 be a pretty risky thing to do?

21 MS. LEVY: Object to form, and  
22 foundation.

23 THE DEPONENT: Can you clarify.

24 Q. (By Ms. Walsh) Well, Uber has its own  
25 analysis and its own data that has led it to

June 11, 2025

1 I, Rebecca L. Romano, a Registered  
2 Professional Reporter, Certified Shorthand  
3 Reporter, Certified Court Reporter, do hereby  
4 certify:

5 That the foregoing proceedings were taken  
6 before me at the time and place herein set forth;  
7 that any deponents in the foregoing proceedings,  
8 prior to testifying, were administered an oath;  
9 that a record of the proceedings was made  
10 stenographically by me and which was thereafter  
11 transcribed under my direction; that the foregoing  
12 transcript is a true record of the testimony given.

13 Further, that if the foregoing pertains to the  
14 original transcript of a deposition in a Federal  
15 Case, before completion of the proceedings, review  
16 of the transcript [ ] was [X] was not requested.

17 I further certify I am neither financially  
18 interested in the action nor a relative or employee  
19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name.

22

23 Dated: June 13th, 2025

24



Rebecca L. Romano, RPR, CCR  
25 CSR. No 12546

June 12, 2025

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, Case No. 3:23-md-03084  
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VIDEO DEPOSITION OF UBER TECHNOLOGIES, INC.'s  
30(b)(6) CORPORATE REPRESENTATIVE - ELIZABETH ROSS

San Francisco, California

Thursday, June 12, 2025

Volume 2

STENOGRAPHICALLY REPORTED BY:  
REBECCA L. ROMANO, RPR, CSR, CCR  
California CSR No. 12546  
Nevada CCR No. 827  
Oregon CSR No. 20-0466  
Washington CCR No. 3491

JOB NO. 6899605-001

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June 12, 2025

1 A. Yes.

2 Q. Okay. Ms. Ross, are you familiar with a  
3 marketing -- well, Uber has a YouTube channel,  
4 right?

5 A. Yes, we do.

6 Q. Okay. And Uber's YouTube channel is  
7 another way that Uber communicates with riders,  
8 right?

9 A. Yes.

10 Q. And markets -- tries to sell more rides  
11 by having people look at its YouTube channel,  
12 right?

13 A. Yeah, we use it as an opportunity to  
14 visually explain products or features or show  
15 campaigns and ads, yes.

16 Q. Okay. And one thing that Uber has done  
17 on its YouTube channel is encourage people after  
18 they've been drinking to take Uber?

19 A. I'm -- I don't -- not that I'm aware of.

20 But there could be videos, like I've  
21 said, where we've done in partnership with MADD,  
22 Mothers Against Drunk Driving, where we talk about  
23 Uber being an option for people to take when  
24 they've been out drinking.

25 Q. Okay. You've mentioned several times

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1 the -- that you've done campaigns in connection  
2 with MADD, Mothers Against Drunk Driving, right?

3 A. Yes.

4 Not me specifically, but, yes, the  
5 marketing team.

6 Q. That Uber has, right?

7 A. Yes.

8 Q. Uber also does marketing campaigns with  
9 beer companies, right?

10 A. Yes, we have partnered in a three-way  
11 partnership with Mothers Against Drunk Driving and  
12 Anheuser-Busch.

13 Q. Okay. Anheuser-Busch, which sells  
14 Budweiser beer, right?

15 A. Yes.

16 Q. Okay. So it's not just Mothers Against  
17 Driving [sic]; it's also these alcohol companies  
18 that you all work with to market your services,  
19 right?

20 A. Yeah.

21 We work with Mothers Against Drunk  
22 Driving alongside Anheuser-Busch because they've  
23 partnered together, as well, because they both want  
24 to stop and end drunk driving incidents and drunk  
25 driving on the road.



June 12, 2025

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19 of any attorney or any party to this action.

20 IN WITNESS WHEREOF, I have this date  
21 subscribed my name.

22

23 Dated: June 16th, 2025

24



25

Rebecca L. Romano, RPR, CCR  
CSR. No 12546